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12  
13 Attorneys for Plaintiff,  
14 ASHA DANIELS

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 ASHA DANIELS, as an Individual,

18 Plaintiffs,

19 v.

20 BIG GRRRL BIG TOURING, INC,  
21 a Delaware Corporation; MELISSA  
22 JEFFERSON (aka "LIZZO"), as an  
23 Individual; CARLINA  
24 GUGLIOTTA, as an Individual; and  
25 DOES 1 through 10, inclusive,

26 Defendants.

27 Case No.: 2:24-cv-03571-FLA-PVC

28 Assigned for All Purposes to  
District Judge: Hon. Fernando L. Aenlle-Rocha  
Magistrate Judge: Hon. Pedro V. Castillo

**DECLARATION OF RONALD L.  
ZAMBRANO**

Action Filed: September 21, 2023  
Removed: April 30, 2024  
Trial Date: December 1, 2025

1                   DECLARATION OF RONALD L. ZAMBRANO

2                   I, RONALD L. ZAMBRANO, declare as follows:

3                   1. I am an attorney duly licensed to practice law in the Central District of  
4 California, and the Employment Litigation Chair with the law firm, West Coast Trial  
5 Lawyers, APLC, attorneys of record for Plaintiff Asha Daniels in the matter known as  
6 *Daniels v. Big Grrl Big Touring*. I declare the following as attorney of record and based  
7 thereon, I can attest the following is true and correct.

8                   2. On December 10, 2025, in compliance with the Court's Order, I provided  
9 Plaintiff with a copy of the Report and Recommendation ("R&R") and a copy of the  
10 Court's Order.

11                  3. On December 11, 2025, I spoke with Plaintiff regarding the R&R and the  
12 Court's Order and confirmed that Plaintiff received both documents.

13                  4. This declaration is submitted in compliance with the Court's Order  
14 requiring Plaintiff's counsel to attest to providing Plaintiff with the R&R and the Order.

15                  I declare under penalty of perjury under the laws of the United States that the  
16 foregoing is true and correct.

17  
18                  Dated: December 15, 2025      WEST COAST EMPLOYMENT LAWYERS, APLC

19  
20                  BY: \_\_\_\_\_  
21                  

22                  Ronald L. Zambrano, Esq.  
23                  Attorney for Plaintiff,  
24                  ASHA DANIELS

## CERTIFICATE OF SERVICE

I am over the age of 18 and am not a party to the above-captioned matter.

On December 15, 2025 I served the documents listed below on the Defendant by automatic electronic transmission via the Court's Case Management and Electronic Case Filing practice as follows:

Martin D. Singer, Bar No. 78166

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LAVELY & SINGER, APC

2049 Century Park East, Suite 2400  
Los Angeles, California 90067-2900

The documents served on December 15, 2025 are:

## **DECLARATION OF RONALD L. ZAMBRANO**

Dated: December 15, 2025

WEST COAST EMPLOYMENT LAWYERS, APLC

DV.

Ronald L. Zambrano, Esq.  
Attorney for Plaintiff,  
ASHA DANIELS